

UNITED STATES DISTRICT COURT
for the
Western District of Texas

United States of America)
v.)
Dillon Scott DEES) Case No. SA:23MJ962
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Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/26/2023 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S. Code § 1958	Use of interstate commerce facilities in the commission of murder-for-hire
	Penalties: Max 10 Years Imprisonment, \$250 Thousand Fine, Max 3 Years Supervised Release, \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

See Attached Affidavit in Support of Application

Continued on the attached sheet.

Reid C. Hudson Digitally signed by Reid C. Hudson
Date: 2023.07.06 08:27:13 -05'00'
Complainant's signature

Reid C. Hudson, Special Agent FBI

Printed name and title

Sworn to before me via telephone,

Date: July 6, 2023

City and state: San Antonio, Texas


Judge's signature
Henry J. Bemporad, United States Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Reid C. Hudson, being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation and have been since June 2022. I am a graduate of the Federal Bureau of Investigation Basic Field Training Course in Quantico, Virginia. I am a duly sworn agent who is authorized to carry firearms, execute warrants and make arrests for offenses against the United States and to perform other duties as authorized by law.
2. The facts contained in this affidavit are based upon information both provided to me by other law enforcement officers and witnesses and obtained firsthand during the course of this investigation. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.
3. On June 26, 2023 a confidential source (CS) was approached by a subject known as "Dillon" (later identified as Dillon Scott DEES) while at a job site within Bexar County, Texas. DEES asked the CS if the CS would be able to find a third party who would carry out a murder for compensation. DEES told the CS that his ex-wife was attempting to move to Ohio with their daughter and that his former father-in-law was a problem for him. DEES stated his former father-in-law is a local police officer and that he has tried to

involve local law enforcement in child custody issues with his ex-wife but nothing is done, which he believes is due to his former father-in-law being an officer. The CS ended this conversation by telling DEES he would attempt to locate someone willing to commit the murder (a hitman).

4. After the conclusion of this conversation, CS contacted DEA TFO David Camacho. CS informed TFO Camacho of what had taken place along with providing DEES's cell phone number. Using law enforcement databases, DEA personnel identified Dillon DEES as the user of the provided phone number. CS provided a recent photo of "Dillon" to TFO Camacho who compared the photo to DEES' Texas Driver's License photo, and confirmed the photos were of the same individual.
5. Using public databases, TFO Camacho was able to locate divorce/child custody records showing DEES and his ex-wife were involved in court proceedings. Further research by TFO Camacho located an emergency contact associated with DEES' ex-wife's Texas Driver's License listing VICTIM 1. TFO Camacho was able to confirm VICTIM 1 is currently employed as a local law enforcement officer.
6. TFO Camacho met with VICTIM 1, who confirmed DEES is his former son-in-law and his daughter is planning to move to Ohio with her husband and daughter.
7. During the evening of June 26, 2023, CS called DEES. This conversation was recorded and provided to your Affiant. In the call, CS asked DEES if he was serious about doing the "shit" they talked about earlier, to which DEES responded "yeah." CS told DEES he has a guy in the valley and can give him the phone number. DEES asked to talk in person and think about it overnight.

8. On June 27, 2023, a meeting was set up between Dillon DEES and CS. CS was provided covert audio/video recording equipment for the meet which was monitored by covert law enforcement officers.
9. Upon the arrival of CS and DEES, DEES entered CS's vehicle where CS and DEES discussed the murder of VICTIM 1. DEES stated he would pay the "hitman" the equivalent of \$27,000 in Bitcoin. DEES told CS that using Bitcoin would make the payment untraceable. DEES requested the murder not take place around his daughter and that his daughter not see the murder. DEES asked if the murder could take place in Ohio as DEES recently got off probation and he feels as though "all eyes [are] on me." DEES told CS he did not want to meet the "hitman," he only wanted to deal with CS.
10. CS and DEES again discussed why DEES wanted VICTIM 1 killed and DEES explained that VICTIM 1 is the reason his ex-wife wants to move to Ohio and accused his ex-wife of being the reason he was convicted of a theft charge for which he was on probation.
11. CS informed DEES the "hitman" would require partial payment prior to the murder, to which DEES agreed. DEES offered to pay off CS vehicle as compensation for setting him up with the "hitman."
12. DEES explained to CS that he has a court hearing on July 13, 2023 for the court to decide if his ex-wife would be allowed to move to Ohio with their daughter or not. DEES stated if this court hearing goes in his favor, he does not want the murder to occur but if the hearing does not go in his favor, he wants the murder to take place. CS told DEES this is a capital offense, which DEES acknowledged.
13. At the conclusion of this meeting TFO Camacho took possession of the audio/video recording devices and provided the audio/video to your Affiant.

14. Based on the foregoing your Affiant believes there is probable cause to believe that on or about June 26, 2023 within the Western District of Texas, Dillon Scott DEES did unlawfully use a facility of interstate and foreign commerce, specifically a phone, with intent that a murder be committed in violation of the laws of the States of Texas and Ohio as consideration for the receipt of and as consideration for a promise and agreement to pay anything of pecuniary value.

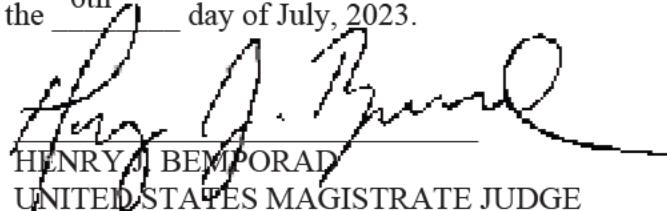
Respectfully Submitted,

**Reid C.
Hudson**

Reid Hudson, Special Agent
Federal Bureau of Investigation

Digitally signed by Reid C.
Hudson
Date: 2023.07.06 08:27 33
-05'00'

Subscribed and sworn to telephonically this the 6th day of July, 2023.


HENRY J. BEMPORAD
UNITED STATES MAGISTRATE JUDGE
WESTERN DISTRICT OF TEXAS